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March 28, 2024

Via ECF:

Judge Taryn A. Merkl  
United States Magistrate Judge  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Shamoli Kapoor v. Michael Matthew's Jewelers LLC, et. al.  
Docket Number: 1:22-cv-05027(HG)(TAM)

Dear Judge Merkl:

I represent defendants Mohammad Butt ("Defendant Mohammad"), Naila Butt ("Defendant Naila"), Laraib Butt ("Defendant Laraib"), and Zuha Butt ("Defendant Zuha") (collectively "Defendants") in the above-referenced matter. I write jointly with Plaintiff's counsel, Joshua J. Lax, Esq., pursuant to the Court's February 12, 2024, Order directing the parties to submit a status report on discovery, settlement discussions, and whether this matter should proceed to a settlement conference.

Regarding discovery, Plaintiff has consented to providing Defendants with an extension until April 5, 2024, to produce responses to Plaintiff's Second Set of Interrogatories and Requests for the Production of Documents and to respond to Plaintiff's deficiency letter.

Regarding settlement, the parties respectfully request a settlement conference with the Court prior to depositions taking place. The parties also request that the taking of depositions be stayed until after the settlement conference so that the parties may devote time and resources to the potential of a successful resolution.

The parties have agreed to conclude fact discovery by July 15, 2024, and have agreed to conclude expert discovery by September 15, 2024. This will hopefully provide sufficient time for the parties to explore settlement, resolve any discovery issues, and complete depositions, and exchange expert discovery.

The parties are available at the Court's convenience to appear for a status conference to discuss the matters raised in this correspondence.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
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Via ECF:

All counsel